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ter, better results might be secured, it would seem, by delegating to administrative boards, similar to those now administering the minimum wage statutes in several states, the task of fixing the exact fields of industry to which the restrictions should apply. See 2 GEO. V, c. 2; WIS. LAWS, 1913, ch. 381; 4 AM. LAB. LEG. REV. 13; 28 HARV. L. REV. 89.

CONSTITUTIONAL LAW — POWERS OF LEGISLATURE: TAXATION — STAMP TAX ON BILL OF COSTS IN STATE COURT. — The United States War Revenue Act of October 22, 1914, on a fair construction, required a litigant in a state court to affix a revenue stamp to his bill of costs, and forbade the clerk of court to certify the bill before a stamp was attached. *Held*, that the provision is unconstitutional. *Neldert v. Chicago, R. I. & P. R. Co.*, City Ct., N. Y., Feb. 9, 1915 (not yet reported).

Congress may not impede the states in the exercise of their reserved governmental powers, one of which is the administration of justice. *Collector v. Day*, 11 Wall. (U. S.) 113; *Bettman v. Warwick*, 108 Fed. 46. Although a tax, the financial burden of which falls directly or indirectly on the state, is the usual mode in which this has been attempted, embarrassments of every description are equally obnoxious to the Constitution. *Jones v. Keep*, 19 Wis. 360; see *McNally v. Field*, 119 Fed. 445, 447. So the tax in the principal case, although it comes out of the litigant's pocket, is objectionable because payment of it is made a condition precedent to execution of the state court's judgment. It has been suggested that the litigant might be held personally liable for the tax, even though the state court's process could not be obstructed to enforce payment. See *Downer*, J., *diss.*, in *Jones v. Keep, supra*, 388. But it is submitted that such a tax on the privilege of seeking justice in the state tribunals would likewise contravene the right of the state to administer justice on its own terms among those who resort to its courts.

CONTRIBUTION — SHIFTING OF CRIMINAL PENALTY TO ONE PRIMARILY RESPONSIBLE. — The plaintiffs, moneylenders, hired the defendants to address envelopes to persons whose names appeared in a certain handbook, but to omit minors. The defendants carelessly included a minor among the addressees, and the plaintiffs innocently sent him a circular. The plaintiffs were convicted of the statutory misdemeanor of sending a moneylender's circular to an infant without reasonable grounds to believe him of full age. This is an action to recover the amount of the fine and costs. *Held*, that only nominal damages are recoverable. *R. Leslie (Ltd.) v. Reliable Advertising and Addressing Agency (Ltd.)*, [1915] 1 K. B. 652.

For a discussion of the novel question of whether one who has suffered a criminal penalty may recover its amount in damages from the one who was responsible for his committing the crime, see NOTES, p. 687.

CORPORATIONS — STOCKHOLDERS: RIGHTS INCIDENT TO MEMBERSHIP — RESTRICTION ON TRANSFER OF SHARES IN AGREEMENT OF ASSOCIATION. — Under a Massachusetts statute which provided that any restrictions on the transfer of stock should be set forth in the agreement of association, it was provided in the agreement and noted on the certificates that none of the shares should be transferred without consent of three-fourths of the capital stock. The defendants acquired stock without complying with this requirement, and now claim to be stockholders and hence qualified to act as directors, on the ground that the restriction is void. *Held*, that the restriction is valid. *Longyear v. Hardman*, 219 Mass. 405, 106 N. E. 1012.

Corporations, like other associations of individuals, often find it expedient for various reasons to limit the admission of new members. While this is usually accomplished by placing restrictions on the transfer of the stock, the